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March 28, 2016

VIA ECF and E-MAIL

The Honorable Katherine B. Forrest United States District Court Southern District of New York 500 Pearl Street, Room 1950 New York, NY 10007

Re: Dansby v. City Of New York, et al.

Docket No.: 16-cv-00327 (KBF)

Dear Judge Forrest:

We represent Plaintiff in the above-captioned matter, and are writing to ask for an extension to May 2, 2016 to file Plaintiff's opposition to Defendants' motion to dismiss (Dkt. # 20-22). Defendants request that they be granted a corresponding two-week extension to file their reply brief on May 16, 2016.

Per Rule 1.G.ii. of Your Honor's Individual Rules, (a) the current due date for Plaintiff's opposition is April 18, 2016; the current due date for Defendants' reply is May 2, 2016; (b) the new due date for Plaintiff's opposition would be May 2, 2016; the new due date for Defendants' reply would be May 16, 2016; (c) this is the first such request; (d) no other requests have been made; (e) Defendants consent to Plaintiff's proposed extension; Plaintiff consents to Defendants' proposed extension; and (f) Plaintiff is asking for this extension due to previously scheduled engagements, including depositions, conferences, and other legal briefs due.

Finally, the parties have an initial conference currently scheduled for April 6, 2016. In light of the pending motion, the parties respectfully ask the Court to adjourn this conference until after the motion's resolution.

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We thank the Court for its attention to this matter.

Respectfully Submitted,

Samuel O. Maduegbuna

SOM/kdw

cc (via ECF):

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